

FILED

UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

IN THE UNITED STATES DISTRICT COURT

APR 11 2025

FOR THE DISTRICT OF NEW MEXICO

MITCHELL R. ELFERS

CLERK

UNITED STATES OF AMERICA,

Criminal No. 25-752 KWR

vs.) Count 1: 18 U.S.C. §§ 1153 and
) 2244(b): Abusive Sexual Contact.

RANDALL MARTINEZ, JR.,

Defendant.

INFORMATION

The United States Attorney charges:

Count 1

Between on or about April 1, 2016 and on or about May 31, 2016, in Indian Country, in San Juan County, in the District of New Mexico, the defendant, **RANDALL MARTINEZ JR.**, an Indian, unlawfully and knowingly engaged in and caused sexual contact with Jane Doe, a child who had not then attained the age of 18 years, and the sexual contact consisted of the defendant intentionally touching Jane Doe's vagina directly and through the clothing, with the intent to abuse, humiliate, harass, degrade, and arouse and gratify the sexual desire of any person.

In violation of 18 U.S.C. §§ 1153 and 2244(b).

HOLLAND S. KASTRIN
Acting United States Attorney

Brittany D'Chaussee
BRITTANY DUCHAUSSEE
Assistant United States Attorney
201 Third Street, Suite 900
Albuquerque, New Mexico 87102
(505) 346-7274